

### REMARKS

Claims 1 to 20 were pending in the above-identified application. Applicant has amended claims 1, 5, 13, and 20, and added claims 21 and 22.

#### Specification

The Examiner objected to the Specification because of informalities. Applicant has amended the Specification as suggested by the Examiner. Accordingly, Applicant requests the Examiner to withdraw the objection to the Specification.

#### § 101 Rejection

The Examiner rejected claim 20 under 35 U.S.C. § 101 because the claimed inventions are directed to non-statutory subject matter. Applicant has amended the preamble of claim 20 as suggested by the Examiner. Accordingly, Applicant requests the Examiner to withdraw the rejection of claim 20 under 35 U.S.C. § 101.

#### §103 Rejections of Claim 1

The Examiner rejected claim 1 under 35 U.S.C. 103(a) as being unpatentable over by U.S. Patent No. 6,625,787 ("Baxter et al.") in view of U.S. Patent Application Publication No. 2002/0083398 ("Takeyama et al."), and further in view of U.S. Patent Application Publication No. 2001/0138817 ("Lec et al.").

Applicant has amended independent claim 1, which now recites:

1. A method for editing a netlist, the method comprising:

providing a version of the netlist comprising a set of netlist modules;

creating a changes module describing at least one consistent change to the netlist modules, the at least one consistent change being applicable to multiple versions of the netlist; and

using the changes module to modify at least one of the netlist modules according to the at least one consistent change to create a modified versions of the netlist.

Amended claim 1 (emphasis added). By creating a changes module describing a consistent change that is applied to multiple versions of a netlist, the design process is improved.

Hence, rather than requiring manual editing a subsequent versions of a netlist 202, the netlist compiler 206 automatically edits the subsequent version of the

netlist 202 with the changes contained in the changes module 204. This automatic editing saves significant development time and resources as well as reducing, or eliminating, the introduction of error during the manual editing of the subsequent netlist 202.

Specification, p. 10, lines 15 to 19. Applicant submits that none of the references disclose "a change module describing at least one consistent change ... applicable to multiple versions of the netlist."

The Examiner cited Lee et al., paragraph 35 and Fig. 2, for disclosing the changes module recited in original claim 1. August 10, 2005 Office Action, p. 5. Lee et al. discloses a design method where antenna diode cells are placed in feed-through cells near designer cells in a netlist. Lee et al., paragraphs 26 to 28. The antenna diode cells are unconnected to the design cells. *Id.* at paragraphs 29 and 30. An engineering change order (ECO) 212 is generated from testing devices made from the netlist to determine those designer cells prone to failure due to electrostatic discharge. *Id.* at paragraphs 32 and 33. An antenna diode selection module 213 then selects antenna diode cells to be connected to those designer cells prone to failure. *Id.* at 34. A netlist modifier module 214 then modifies the netlist to connect the selected antenna diode cells to those designer cells. *Id.* at 35.

Netlist modifier module 214 does not apply a consistent change to multiple versions of a netlist. First, Lee et al. does not disclose using netlist modifier module 214 to modify multiple versions of the same netlist. Netlist modifier module 214 is used to modify a single version of the netlist. Second, even assuming that one uses netlist modifier module 214 to modify multiple versions of the same netlist, netlist modifier module 214 does not apply a consistent change to multiple versions of the same netlist. This is because netlist modifier module 214 would place antenna diode at different designer cells to protect them from electrostatic discharge in different versions of the netlist. Thus, netlist modifier module 214 would not apply a consistent change to different versions of the netlist.

Accordingly, claim 1 is patentable over the combination of Baxter et al., Takeyama et al., and Lee et al. because Lee et al. does not disclose "a change module describing at least one consistent change ... applicable to multiple versions of the netlist" as recited in amended claim 1.

#### § 103 Rejections of Claims 2 to 12

Claims 2 to 12 depend from claim 1 and are patentable over the cited references for at least the same reasons as claim 1.

§103 Rejections of Claims 13 to 19

The Examiner rejected independent claim 13 under 35 U.S.C. 103(a) as being unpatentable over Baxter et al. in view of Takeyama et al., and further in view of Lee et al. and U.S. Patent No. 5,610,832 ("Wikle et al."). Applicant has amended claim 13 with similar language as amended claim 1. Accordingly, claim 13 is patentable over the cited references for at least the same reasons as amended claim 1.

Claims 14 to 19 depend from claim 13 and are patentable over the cited references for at least the same reasons as claim 13.

§ 103 Rejection of Claim 20


The Examiner rejected independent claim 20 under 35 U.S.C. 103(a) as being unpatentable over Takeyama et al. in view of Lee et al. Applicant has amended claim 20 with similar language as amended claim 1. Accordingly, claim 20 is patentable over the cited references for at least the same reasons as amended claim 1.

New Claims 21 and 22

Claims 21 and 22 depend from claims 1 and 13, respectively, and are patentable over the cited references for at least the same reasons as their base claims.

Summary

In summary, claims 1 to 22 were pending in the present application. Applicant has amended claims 1, 5, 13, and 20, and added claims 21 and 22. For the above reasons, Applicant respectfully requests the Examiner to withdraw the claim rejections and allow claims 1 to 22. Should the Examiner have any questions, please call the undersigned at (408) 382-0480x206.

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Respectfully submitted,



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